

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of ) MM Docket No. 93-13  
)  
Amendment of Section 73.202(b), )  
Table of Allotments ) RM-8156  
FM Broadcast Stations. ) RM-8234  
(Blanchard, Louisiana and )  
Stephens, Arkansas) )

To: Chief, Allocations Branch  
Policy and Rules Division

REPLY COMMENTS

Arkansas Wireless Co. ("Wireless"), by its attorneys and pursuant to the Notice of Proposed Rule Making ("NPRM"), DA 93-63, released February 5, 1993, Erratum released March 12, 1993, and the Public Notice of Wireless' Counterproposal, FCC Report No. 1940, released May 12, 1993, hereby submits its Reply Comments and restates its intention to apply for the allocation of Channel 271A proposed to be made at Stephens, Arkansas.

The captioned Petition for Rule Making was filed by Daryl L. Bordelon ("Petitioner") on December 29, 1992. Petitioner sought amendment to Section 73.202 of the Commission's Rules to allot Channel 271C3 to Blanchard, Louisiana. Wireless has counterproposed that Rule 73.202 be

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instead amended to allocate Channel 271A to Stephens, Arkansas, as that community's first local service. Since Wireless Counterproposal is mutually exclusive with Petitioner's request, both cannot be granted.

Wireless provided a Technical Statement in its Counterproposal which showed that, according to the 1990 U.S. Census, the population of Stephens is 1137, almost identical with that of Blanchard. While the proposed Stephens and Blanchard allocations propose a first local service, Stephens receives significantly less AM and FM service of 1.0 mV/m or greater than does Blanchard. Accordingly, Stephens is the preferred community under Section 307(b) of the Communications Act of 1934, as amended.

In the Technical Statement attached to these Reply Comments, it is shown that Blanchard, little more than a bedroom community of Shreveport, Louisiana, receives nearly three times the number of aural signals than does Stephens, Arkansas (11 signals as compared to 4 signals). In short, Blanchard is well served by the phalanx of radio signals which envelop it.

Wireless restates its present intention to apply for the Stephens channel if it is allotted and, if it is authorized, to build a station promptly.

WHEREFORE, for these reasons, the Arkansas Wireless Co.'s Counterproposal should be granted and Section 73.202 of the Commission's Rules amended to allot Channel 271A to Stephens, Arkansas, as its first local aural service.

Respectfully submitted,

ARKANSAS WIRELESS CO.

By:   
F. Joseph Brinig

Its Attorney

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Attachment

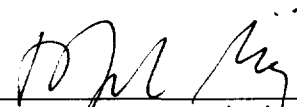
May 27, 1993

CERTIFICATE OF SERVICE

I hereby certify that I have, this 27th day of May, 1993, served the foregoing "Reply Comments" upon the following persons by first class United States Mail, postage prepaid:

Mr. Daryl L. Bordelon  
6036 Dillingham Avenue  
Shreveport, Louisiana 71106

Mr. Larry G. Fuss  
Contemporary Communications  
P.O. Box 1787  
Cleveland, Mississippi 38732

  
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F. Joseph Brinig

COUNTER PROPOSAL  
MM Docket No. 93-13  
RM-8156  
Amendment of Section 73.202(b)  
Table of Allotments  
FM Broadcast Stations  
(Blanchard, Louisiana)  
May 1993

TECHNICAL STATEMENT

This Technical Statement and attached exhibits were prepared on behalf of Arkansas Wireless Co. and supports its counter proposal to add Channel 271A to Stephens, Arkansas, in lieu of Blanchard, Louisiana.

A study of Channel 271A, attached as an exhibit, indicates that it can be assigned to Stephens, Arkansas, and meet all the requirements of Section 307(b) of the Commissions rules except for the proposed allotment at Blanchard, Louisiana. The site coordinates, of N.L. 33 23' 35", W.L. 93 06' 57", were chosen since some restriction is necessary to the southwest of Stephens, Arkansas. This site is within 6 km of the proposed city of license. Therefore, this proposal is in compliance with Section 73.315(a) & (b).

The 1990 United States Census report indicates 1137 persons reside in Stephens, Arkansas.

# REQUESTED ALLOCATION

<u>LOCATION</u>	<u>PRESENT</u>	<u>PROPOSED</u>
Stephens, Arkansas	-----	271A

Arkansas Wireless Co. will make prompt application for the facilities if Channel 271A is assigned to Stephens, Arkansas.

Exhibits 1 and 2 tabulate the location and distance to stations within 80 kilometers of the proposed allocations. The numbering in the "number of stations" column indicates the number of stations with 1 mV/m or greater signal at the coordinates of the proposed allotment. For the purposes of this study, uniform coverage was assumed, since the terrain at both proposed locations is essentially flat.

Stephens, Arkansas, has a total of four signals and Blanchard, Louisiana, located adjacent to Shreveport, Louisiana, has a total of 11 signals.

MAPFM search of channels 200 to 300, at N. 33 23 35, W. 93 6 57:

STEPHENS, ARKANSAS

Listing of all records within 80 kilometers:

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	Number of Stations
KCAC	Camden	AR	208	A	C	33.2	0.0	52.5°	
KBSA	El Dorado	AR	215	C3	L	40.7	0.0	109.3°	
K219AZ	Hope	AR	219	D	C	48.9	0.0	309.1°	
K220DW	El Dorado	AR	220	D	C	45.8	0.0	123.2°	
ALC	Gurdon	AR	224	A	U	61.5	0.0	354.6°	
ALC	Springhill	LA	224	A	U	54.5	0.0	218.4°	
KGAP	Gurdon	AR	224	A	L	61.5	0.0	354.6°	
KTKC	Springhill	LA	224	A	T	54.5	0.0	218.4°	

KWHNFM	Haynesville	LA	288	A	C	38.0	0.0	188.2°
ALC	Haynesville	LA	288	A	U	45.9	0.0	183.3°
ALC	Texarkana	AR	292	C2	V	78.6	0.0	262.6°
KUKB	Texarkana	AR	292	C2	A	78.0	0.0	263.1°
KUKB	Texarkana	AR	292	A	C	77.1	0.0	268.7°
ALC	Homer	LA	294	C2	U	64.5	0.0	186.4°
K295AB	Hope	AR	295	D	C	51.9	0.0	307.3°
KKOL	Hampton	AR	296	A	L	52.1	0.0	71.8°
ALC	Hampton	AR	296	A	L	52.1	0.0	71.8°



MAPFM search of channels 200 to 300, at N. 32 35 18, W. 93 53 31:  
BLANCHARD, LOUISIANA

Listing of all records within 80 kilometers:

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	Number of Stations
KDAQ	Shreveport	LA	210	C1	L	10.5	0.0	342.0°	
K214BE	Shreveport, etc.	LA	214	D	L	16.5	0.0	126.6°	
NEW-T	Shreveport	LA	215	D	A	3.5	0.0	29.2°	
KBWC	Marshall	TX	216	A	L	45.7	0.0	262.8°	
KSCL	Shreveport	LA	217	A	L	19.0	0.0	127.6°	
ALC	Benton	LA	221	A	U	20.0	0.0	68.2°	
KLKL	Benton	LA	221	A	L	20.0	0.0	68.2°	(1)
ALC	Marshall	TX	222	A	U	46.3	0.0	264.7°	
KCULFM	Marshall	TX	222	A	L	48.1	0.0	263.7°	
ALC	Mansfield	LA	224	A	U	64.5	0.0	167.0°	
ALC	Springhill	LA	224	A	U	60.5	0.0	39.8°	
KJVC	Mansfield	LA	224	A	L	64.5	0.0	167.0°	
KTKC	Springhill	LA	224	A	L	60.5	0.0	39.8°	
KITT	Shreveport	LA	229	C	L	10.5	0.0	341.1°	(2)
ALC	Shreveport	LA	229	C	U	10.5	0.0	341.1°	
KWKHFM	Shreveport	LA	233	C	L	9.9	0.0	337.0°	(3)
ALC	Shreveport	LA	233	C	U	9.9	0.0	337.0°	
ALC	Minden	LA	237	A	U	57.4	0.0	85.3°	
KASOFM	Minden	LA	237	A	L	57.4	0.0	85.3°	
KASOFM	Minden	LA	237	A	D	57.4	0.0	85.3°	
KNCBFM	Vivian	LA	239	A	C	35.8	0.0	346.2°	
KASOFM	Minden	LA	239	A	A	57.4	0.0	85.3°	
KVKIFM	Shreveport	LA	243	C1	L	3.0	0.0	78.1°	(4)
ALC	Shreveport	LA	243	C1	U	3.0	0.0	78.1°	
ALC	Longview	TX	247	C2	V	79.7	0.0	262.3°	
ALC	Texarkana	TX	251	C	U	36.5	0.0	343.0°	
KTALFM	Texarkana	TX	251	C	L	36.5	0.0	343.0°	(5)
KTUX	Carthage	TX	255	C1	L	25.2	0.0	208.4°	(6)
ALC	Carthage	TX	255	C1	U	25.2	0.0	208.4°	
KPYN	Atlanta	TX	257	A	L	61.0	0.0	333.6°	
KMJJFM	Shreveport	LA	259	C2	A	11.3	0.0	79.2°	(7)
ALC	Shreveport	LA	259	C2	V	9.9	0.0	121.4°	
NEW	Homer	LA	260	A	A	79.2	0.0	78.6°	
KMJJFM	Shreveport	LA	261	A	L	15.8	0.0	124.9°	(7)
KPYN	Atlanta	TX	261	C2	A	76.2	0.0	346.1°	
ALC	Atlanta	TX	261	C2	V	63.2	0.0	341.7°	
ALC	Shreveport	LA	266	C	U	11.5	0.0	340.2°	
KRMDFM	Shreveport	LA	266	C	L	11.5	0.0	340.2°	(8)
ALC	Blanchard	LA	271	C3	A	0.0	0.0	0.0°	
ALC	Shreveport	LA	275	C2	V	35.5	0.0	147.9°	
NEW	Shreveport	LA	275	C2	A	28.1	0.0	176.4°	
NEW	Shreveport	LA	275	C2	A	19.5	0.0	182.0°	
NEW	Shreveport	LA	275	C2	A	31.1	0.0	146.8°	
NEW	Shreveport	LA	275	C2	A	2.6	0.0	122.6°	
ALC	Haughton	LA	279	A	U	37.0	0.0	99.6°	
KDKSFM	Haughton	LA	279	A	C	29.3	0.0	97.7°	(9)
ALC	Marshall	TX	280	A	U	43.2	0.0	266.4°	
KMHTFM	Marshall	TX	280	A	L	43.2	0.0	266.4°	
KGASFM	Carthage	TX	282	A	C	70.6	0.0	225.6°	
NEW	Carthage	TX	282	A	U	62.7	0.0	222.2°	

KJTX	Jefferson	TX 283 A L	51.1	0.0	297.8°
ALC	Jefferson	TX 283 A U	49.2	0.0	300.1°
NEW	Mansfield	LA 284 C3 A	65.9	0.0	180.9°
NEW	Mansfield	LA 284 C3 A	69.3	0.0	180.6°
NEW	Mansfield	LA 284 C3 A	62.9	0.0	181.0°
ALC	Mansfield	LA 284 C3 V	70.6	0.0	179.5°
ALC	Vivian	LA 287 A V	38.9	0.0	354.3°
ALC	Texarkana	AR 292 C2 V	79.3	0.0	355.9°
KZXB	Homer	LA 294 C2 C	61.0	0.0	87.0°
ALC	Homer	LA 294 C2 U	70.2	0.0	69.0°
NEW-T	Shreveport, etc.	LA 296 D A	2.6	0.0	120.0°

KWKH (AM) Shreveport, LA 50 kw Day / Night (10)

KEEL (AM) Shreveport, LA 50 kw Day / 5 kw Night (11)